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12 *X Corp.*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15

16 X CORP., a Nevada corporation,
17 Plaintiff,
18 vs.
19 BRIGHT DATA LTD., an Israeli
corporation,
20 Defendant.
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Case No. 3:23-cv-03698-WHA

**DECLARATION OF ANDREW H.
SCHAPIRO IN SUPPORT OF
PLAINTIFF'S MOTION FOR LEAVE
TO AMEND COMPLAINT**

1 I, Andrew H. Schapiro, submit this declaration on behalf of Quinn Emanuel Urquhart &
2 Sullivan, LLP and hereby state under penalty of perjury as follows:

3 1. I am a partner with the law firm Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn
4 Emanuel”), and I am Quinn Emanuel’s lead counsel for Plaintiff X Corp. (“Plaintiff” or “X”) in this
5 matter.

6 2. I make this declaration in support of Plaintiff’s Motion for Leave to Amend Complaint
7 (the “Motion”), and I have personal knowledge of the information contained herein.

8 3. Attached as Exhibit A to the Motion is a true and correct copy of Plaintiff’s Proposed
9 Second Amended Complaint in this matter, including the exhibits to the Second Amended Complaint,
10 which were also filed as exhibits to the First Amended Complaint.

11 4. Attached as Exhibit B to the Motion is a true and correct copy of a Redline Between
12 First Amended Complaint and Proposed Second Amended Complaint.

13 5. I declare under penalty of perjury under the laws of the United States of America that
14 to the best of my knowledge the foregoing is true and correct.

15 Executed on June 6, 2024 in Chicago, Illinois.

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18 By: /s/ Andrew H. Schapiro
19 Andrew H. Schapiro